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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
GARY STEPHEN MAYNARD,  
  
Defendant.

CASE NO. 2:21-CR-0224 TLN

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
FINDINGS AND ORDER

DATE: March 31, 2022  
TIME: 9:30 a.m.  
COURT: Hon. Troy L. Nunley

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on March 31, 2022.
2. By this stipulation, defendant now moves to continue the status conference until June 2, 2022, at 9:30 a.m., and to exclude time between March 31, 2022, and June 2, 2022, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) Discovery associated with this case includes at least 12061 pages of reports, photographs, and other documents. This number of discovery pages also includes pages that are placeholders for electronic data produced in native formats, such as video recordings. All of this discovery has been either produced directly to counsel and/or made available for inspection and

1 copying. Current defense counsel, Ms. Sinha, and defense experts have been reviewing the  
2 voluminous discovery, which was provided in a digital format. The government and defense  
3 counsel also previously arranged for an in-person inspection of the defendant's seized vehicle by  
4 a defense investigator, and the government has made available for inspection all other physical  
5 items seized during the investigation. Defense counsel has asked the government clarifying  
6 questions about the discovery production data files and the government has provided answers to  
7 assist the defense team's ongoing review.

8 b) Counsel for defendant desires additional time to review the voluminous  
9 discovery, including reviewing reports, viewing videos and photographs, and examining other  
10 electronic data and documents. In addition, counsel for the defendant desires additional time to  
11 continue to conduct an independent defense investigation of the case, including review of  
12 relevant materials by defense experts.

13 c) Counsel for defendant believes that failure to grant the above-requested  
14 continuance would deny her the reasonable time necessary for effective preparation, taking into  
15 account the exercise of due diligence.

16 d) The government does not object to the continuance.

17 e) Based on the above-stated findings, the ends of justice served by continuing the  
18 case as requested outweigh the interest of the public and the defendant in a trial within the  
19 original date prescribed by the Speedy Trial Act.

20 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
21 et seq., within which trial must commence, the time period of March 31, 2022 to June 2, 2022,  
22 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
23 because it results from a continuance granted by the Court at defendant's request on the basis of  
24 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
25 of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: March 23, 2022

PHILLIP A. TALBERT  
United States Attorney

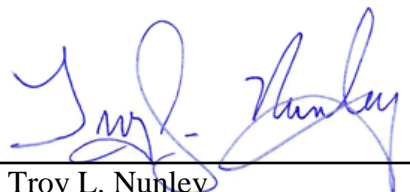
/s/ MICHAEL D. ANDERSON  
MICHAEL D. ANDERSON  
Assistant United States Attorney

Dated: March 23, 2022

/s/ CHRISTINA SINHA  
CHRISTINA SINHA  
Counsel for Defendant  
GARY STEPHEN MAYNARD

**ORDER**

IT IS SO FOUND AND ORDERED this 28<sup>th</sup> day of March, 2022.

  
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Troy L. Nunley  
United States District Judge